ELE BRANCH REVIEW

DATE:	INOUT	INOUT_	7, IN	/7/77 OUT	7/19/77
	FISH & WILDLIFE	ENVIRONMENTAL CHEMISTRY	·	EFFICACY	7
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	REG. NO. 39365-	-R	-:		
PETITION	N OR EXP. PERMIT NO.	025539	.•		
	V. RECEIVED 8/12/7				
DATE OF	SUBMISSION 8/12/7			•	,
DATE SUB	MISSION ACCEPTED			•	
TYPE PRO	DUCT(S): I, D, H, (F)	N, R, S	•		
	MGR. NO. 22				
PRODUCT 1	NAME(S)Everseal		······································		
COMPANY 1	NAMEEverseal M	danufacturing Co., Inc.	•		, se
SUBMISSIC	ON PURPOSE Canvas Pre	eservative			
		er 8-quinolinolate 1.12% pa	aste (O	.2% copper	<u>~)</u>

Efficacy Review:

- 200.0 Introduction
- 200.1 Use: preservative and mildewcide for use on canvas.
- 201.0 Data Summary
- 201.1.1 Brief description of tests. No data were submitted for the product. Data were referenced for the basic manufacturer's data, but this included only uses for wood preservation. A copy of Federal Specification TT-P-595A, April 1972, Preservative coating, canvas was submitted.
- 202.0 Conclusions and Recommendations
- 202.2.1 Insufficient data.

The data submitted for this product are insufficient to demonstrate the efficacy of this product for use on canvas. The referenced data were all on wood products; none were submitted for canvas. The Federal Specification submitted may be used in lieu of data. It is not clear from the information submitted what specific claims are intended. The term "preservative coating" implies that the product will prevent rot and deterioration due to fungi. If not prevention is intended, this should be stated on the label and data presented to substantiate the claim. If rot is not intended, clarify or delete the term "preservative." The Federal Specification, although titled, "Preservative Coating, Canvas" does not appear to address rot.

In regard to mildew claims, labeling should also more specifically state the intended use of the product. The Federal Specification indicates that this type of product is for "retreating of tentage and tarpaulins," for mildew control. This should be stated on the label as well as when to retreat and the interval between treatments as determined by appropriate testing. Data must also be submitted to demonstrate that when the product is applied as recommended on the label, deposition of copper will be within the range indicated in the specifications (0:180.27 o.15 - 0.27 percent copper).

The product must be tested utilizing one of the following test methods or by some alternative method that will adequately demonstrate the efficacy of the product. Federal Test Method Standard. Mildew resistance of textile materials: soil burial method. Method 5762 in Textile Test Methods No. 191. General

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Services Administration may be used to support claims for products to control rot and decay and mold and mildew of textiles in contact with soil. Federal Test Method Standard. Mildew resistance of textile materials: mixed culture method. Method 5760 in Textile Test Methods No. 191, General Services Administration may be used to support rot and decay and mold and mildew claims when the fabric will not contact soil. If only mold and mildew protection are intended, a simulated inuse type of test should be conducted. Since tentage and tarpaulins will mainly be used out of doors, appropriate weathering and leaching of fabrics must be accomplished to give an indication of the duration of the treatment and the need for re-treatment. In case there are no standard test methodsappropriate for your product, a test protocol should be submitted for approval prior to testing.

Ida Jalle Carl Grable Efficacy Section

EEE Branch